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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
RICARDO MANZO-RANGEL,  
ARMANDO REYES-CORNEJO, and  
GABRIELA SOLIS  
  
Defendant.

No.: CR 05-00555 CRB

PARTIES' STIPULATION AND  
~~PROPOSED~~ ORDER EXCLUDING  
TIME UNDER SPEEDY TRIAL ACT

The parties stipulate and agree, and the Court finds and holds, as follows:

1. The parties initially appeared before the Honorable Charles R. Breyer on August 31, 2005.

The matter was continued until October 12, 2005 for status.

2. The government indicated that discovery was still being produced. Defense counsel stated that they required additional time to receive and review discovery and to effectively prepare the case. Counsel requested an exclusion of time on this basis.

3. In light of the foregoing facts, the failure to grant the requested exclusion would unreasonably deny the defendants effective preparation of counsel as well as continuity of counsel. See 18 U.S.C. § 3161(h)(8)(A), (B)(iv). The ends of justice would be served by the

1 Court excluding the proposed time period. These ends outweigh the best interest of the public  
2 and the defendant in a speedy trial. See id. § 3161(h)(8)(A).

3 4. For the reasons stated, the time period from August 31, 2005 through October 12, 2005,  
4 hall be excluded from the calculation of time under the Speedy Trial Act.

5 SO STIPULATED.

6 DATED: 9/12/05

Respectfully Submitted,

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8  
9 /s/  
SUSAN R. JERICH  
Assistant United States Attorney

10  
11  
12 DATED: 9/14/05

/s/  
ELIZABETH M. FALK  
Counsel for Defendant Gabriela Solis

13  
14 DATED: 9/14/05

/s/  
GLENN K. OSAJIMA  
Counsel for Defendant Armando Reyes Cornejo

15  
16 DATED: 9/20/05

/s/  
MICHAEL STEPANIAN  
Counsel for Defendant Ricardo Manzo-Rangel

17  
18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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21 DATED: October 3, 2005

22 HON. CHARLES R. BREYER  
United States District Judge

